

## HHA Survey Protocol Questions & Answers (Q & A) from April 6, 2011 Webinar

### **Question #1**

If agencies do not report to OASIS, is this a serious problem?

### **Answer #1**

Not reporting OASIS is a significant problem, even the administrator said to us recently. We go through a process annually of looking at agencies that did not report OASIS because it affects the Deficit Reduction Act and then they get a 2 percent reduction in the market basket increase the following year. There were a multitude of agencies that had not reported OASIS. These agencies were notified that they would be getting a reduction and many appealed, and some were overturned and some were upheld. Dr. Berwick basically said he felt it was important that everybody report OASIS on all the patients that were required.

### **Question #2**

Is OASIS important in the survey process?

### **Answer #2**

It's important to us because it's integral, integral to our survey process, that the surveyor be able to focus attention during the pre-survey prep. I know this has come up recently in a couple of states, and in some cases, it is a definite condition-level deficiency. In other cases, it will depend on circumstances and who, what, where, when, why, but it is a significant deficiency. In many cases it can be a condition-level deficiency. Not in all cases – it depends, and I can't answer that specifically because I don't have the specifics of the individual survey. That is something that should be addressed with the surveyors at the State Agency, the Regional Office, and possibly Central Office.

### **Question #3**

Should the surveys have to prove how not reporting OASIS impacts patient care when calling out an OASIS (field team)?

### **Answer #3**

It does have a patient outcome because if there is no OASIS, there are no reports, and without the appropriate reports, we can't do our survey process, and that could potentially affect the care to all the patients of the agency. So, it is very significant.

### **Question #4**

Where so I do I find the entrance conference questions?

### **Answer #4**

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The entrance conference questions can be found in the Survey & Certification letter with Appendix B. The first 30 pages relate to the investigative procedures, and it goes through the survey tasks, pre survey prep, and what the surveyor looks for in the worksheets. Starting on page 14, when it talks about (task 2) entrance interview, then it starts with the questions that surveyors can ask. It talks about what they can ask administrators, managers, interviewing clinical managers, everybody. That starts on page 14 and goes through all the different tasks and the probes associated with the different tasks.

### **Question #5**

If these are not currently official, do we use the worksheets along with the current 1515 FAIs?

### **Answer #5**

I would recommend that the surveyors use the new worksheets. I think all of the information that was on the 1515 is now on one of the worksheets. We were very careful with everything important on the worksheet. So, either Worksheet, 1, Patient Sample, pretty much has all the information. The surveyor can always attach documentation similar to the 1515. They don't have to rewrite everything. They can attach OASIS documents, visit notes, any information they feel pertinent to the survey should be attached to the worksheets. So, basically they replace the 1515.

### **Question #6**

A specific issue I would like to inquire about is the new protocol has dropped G323, in which OASIS data had to be transmitted at least monthly. Our position had been to send letters to agencies when we noticed data not being sent in monthly. The requirement for reporting monthly seems to be now be addressed at G322 in which transmission is required only if they have patients that qualify. Is this your interpretation that transmissions are only needed when the agency has patients?

### **Answer #6**

I need to explain a little bit about this. The current existing Appendix B, the one in place now, was written in 2005. In 2006, the OASIS reporting regulation was changed, and it dropped the seven-day (lock) requirement and modified the language. The language in this version is directly from the online current regulation.

G323 was actually dropped, and a lot of people think the numbers got rearranged. They did not. What is in this document coincides with the current regulation. The actual text for G323 was dropped. So, this is the current reg text and the current tag which should coincide with what is in

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Aspen. We will probably be trying to update Aspen in the future which most of the states understand is a lengthy process because of all the lineup of work to be done in Aspen.

### **Question #7**

Did I hear you correctly say the new protocols would go into effect December 1, 2011?

### **Answer #7**

They go into effect May 1, 2011 this is the first week in April. We do not expect everybody to be totally proficient by May 1, so what we have determined is between now and the end of July, we would like everybody to start using these protocols. Send in questions; we'll try to answer questions. But between now and the end of July, we will have had two HHA Basic trainings. This Webinar from today will have been archived so that people can go back and review it and we hope that by the end of July, surveyors across the country should be proficient with the new survey process. And if we have to make changes, we'll address them as they come up.

### **Question #8**

Will the surveyor have OASIS report before coming to the agency?

### **Answer #8**

With the implementation of OASIS-C, it affected the production of the OASIS report for the survey process. The Casper system, by the end of the May, unless somebody hasn't told me something, should be updated with new OASIS reports. Home Care Compare will be refreshed with new reports in July. The reports the surveyors use, the one button reports, the survey report package should be available by the end of May. Until then you can use the data that's in the system which is old, but it's still reflective of practice in the agency through the end of '09.

But we started collecting OASIS-C in January 2010 and the researchers and the people who do the data crunching insisted on 12 months of data before producing the new report. Now you can go in the system and individually pick out error reports and submission statistics for this past year. But it's not under the one button reports as previously conveniently provided. You can look them up individually, the error submission and submission statistics, but the potentially avoidable events and the outcome reports should be available at the end of May for 2010.

Note: The webinar was held April 6, 2011. The following week, CMS announced that, due to delays with risk adjustment calculations, the Casper reports would be delayed until July 2011. Following release of the OASIS-C reports, the HHA Surveyor reports will be updated.

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**Question #9**

When will the final copy, Appendix B be available? Not the advance, but the final.

**Answer #9**

Well that's a lengthy process and what we have to do is make some little tweaks. I would go with this for the time being because once we fix typos and little issues it has to go through a fairly lengthy, laborious process with OSORA before it's actually posted. So even though this says advance copy draft it is what will be the final, other than fixing a few typos.

**Question #10**

Does the new worksheet replace all of the previous modules, 1515 A through F?

**Answer #10**

Yes it does. All those pages which people complained about have all been replaced by these three worksheets. There are more pages but hopefully it's better organized.

**Question #11**

Are you planning on releasing a crosswalk identifying the difference between the previous survey approach to the new survey approach?

**Answer #11**

Basically the new Appendix B discusses the revised approach. We're not planning on issuing a crosswalk.

**Question #12**

Where can I find the worksheet references Exhibit 285 (OASIS) Review Worksheet?

**Answer #12**

Is that the surveyor worksheet? That is attached to Survey and Certification letter 03-13 and you can get that on the site [www.cms.hhs.gov/surveycertificationgeninfo/](http://www.cms.hhs.gov/surveycertificationgeninfo/). On the left there's a link to Policy and Memos to States and Regions. It's basically the link to the Survey and Cert letters and you would either sort by Revised Survey Protocols, because I think that's the name of the old Surveys letter or 03-13. Go through the numerical listing until you get to 03-13, which was posted in February of 2003.

**Question #13**

Will form 1572A be used?

**Answer #13**

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Yes, 1572A continues to be used. That reflects data entry into Aspen, so surveyors that have laptops that use Aspen would do it online. If you don't have a laptop then basically the data entry form for Aspen is still used. The 1572 is still a valid form.

### **Question #14**

If an agency identifies OASIS errors resulting in an inaccurate discharge or adverse outcome report during a retrospective review is it suggested that agencies correct such in the OASIS reports and if so what is the outside time period such should be completed?

### **Answer #14**

Well, we do not have a specific time period for correcting. We want the OASIS system to have accurate data so agencies can go back in for a considerable period of time. I think it's a couple of years to correct data. Data should always be corrected if it affects the care plan or billing but there's no time limit. If you correct it will take a considerable amount of time to catch up on Home Care Compare but I think your Casper report should correct within a month or two.

### **Question #15**

If a survey is completed before May 1st, 2011 do we use the new regs or the old regs to write up after May 1?

### **Answer #15**

I would suggest the old process. I mean I'm not going to be jumping on this May 3rd to see, it's going to take a while. We understand it's going to take a while, and that's why I said they are effective May 1st. If a provider called me earlier in the week and wanted to know if the survey was started in April and ended in May what survey process should be used? And I think we feel, you start in one process and that's the way you finish that survey. So I would use the current process.

### **Question #16**

Where can we get a copy of that calendar worksheet?

### **Answer #16**

Go to the OASIS training site, [www.cms.hhs.gov/oasis](http://www.cms.hhs.gov/oasis) . On the left side, click on Training, and then there's a link to a page that has all of the handouts. It's got the Survey and Cert letter, the G-tags, OASIS Gtags, the worksheet, the calendar, the other worksheet and the protocol master table which is the grid.

### **Question #17**

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Will the Worksheets 1 and 2 be in a format that the surveyor can complete electronically?

### **Answer #17**

We have no plans to do that at this time; we don't have that capability here. They're being pilot tested, and at some point in the future when they become final CMS forms, I don't know if they'll be able to be electronically completed. But at this time we just have the PDF files that are attached to the Web site for downloading.

### **Question #18**

How are you going to handle surveys when records all are electronic?

### **Answer #18**

The surveyors have the capability now to ask to be guided through the electronic record. They can print what documentation they need. I believe there's a Survey and Cert letter last year that was primarily related to nursing homes but is applicable to all providers. Now we need to acknowledge that there are a lot of different vendors for home health electronics and it is impossible for every surveyor to learn every system; some of them are very complex.

A surveyor will ask to be introduced to the electronic record and can request certain documents to be printed. We do want to save on paper and not provide undue hardship to the agencies, but the surveyor needs to do their job and certainly should be able to have access to all information. If there's any document the surveyor needs to support a deficiency or compare with other information they should be able to have that document printed. I think that's consistent with the Survey and Cert letter about surveyors and electronic records.

### **Question #19**

When did you say exhibit 285 would be available?

### **Answer #19**

Exhibit 285 is the surveyor worksheet that is attached to Survey and Cert letter 03-13. It's on the website on the general information under, Policy Memos to States and Regions, it's been there since 2003. It's in the body of the Survey and Cert letter. The Survey and Cert letter gives instruction for how to fill it out and it's included in that Survey and Cert letter.

You can get it by the SOM links as well.

Oh, and there's a link in the SOM that should connect to the exhibit. In the body of the SOM there are links to a separate link for exhibit. If you're on the manuals page and you go to the

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state operations manual you would link the certification process in chapter two of the SOM has the links embedded. But there's another link at the bottom for exhibits and appendices. So you can click on the exhibits and get to that worksheet that way. We could post it to the OASIS training site, too.

### **Question #20**

If we have electronic recordkeeping how does the surveyor navigate the system of the HHA?

### **Answer #20**

The agency needs to orient the surveyor to the electronic record. We cannot expect every surveyor to learn the intricacies of every software vendor. So the agency needs to assign a person to help the surveyor navigate through the software. The surveyors can't learn every record so the agency needs to assure that the surveyor can see everything in the record and see what's appropriate.

### **Question #21**

Can the electronic record be printed for the surveyor to review, and will additional time be provided to the agency to provide this information to the surveyor?

### **Answer #21**

We encourage the surveyor to request minimal information printed. If it's unavailable to be viewed onscreen or if it's unwieldy, the surveyor can ask for it to be printed within a reasonable period of time. I know what it's like to try to print a medical record; it is sometimes very complex and time-consuming but the surveyor needs to be able to do their job and review the clinical record. So either they can review it online or on paper. We would prefer that it be online if that's reasonably possible.

### **Question #22**

What website can we access as a clearinghouse for the information they are always putting out relative to HHA?

### **Answer #22**

The HHA Center is probably the best location, and I think that's at [www.cms.hhs.gov](http://www.cms.hhs.gov). I can tell you my shortcut, we go down to the bottom or close to the bottom where it says, "Fee-For-Service providers," click on that and then you get a list on the left hand side. And I click on "Home Health Agency". And then it will take me to the home health agency page which includes payment, survey and certification, billing, most things appropriate to home health. You can also look on our – a lot of stuff is on the OASIS page and the quality initiatives page.

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**Question #23**

If a surveyor prints records out of an agency electronic medical record are they required to notify the agency what copies of records they are keeping, taking with them?

**Answer #22**

I believe so.